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Attorneys for Plaintiff
ELAINE WITHROW

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ELAINE WITHROW, an individual;

Case No. 2:15-cv-01573-GMN-(GWF)

Plaintiff,

vs.

CAMDEN DEVELOPMENT, INC., a Delaware
corporation; et al.,

Defendants.

THE PARTIES' STIPULATION
AND ~~PROPOSED~~ ORDER
EXTENDING THE BRIEFING SCHEDULE, and
CONTINUING THE OCTOBER 1, 2015
HEARING DATE ON DEFENDANTS'
MOTION TO TRANSFER VENUE
(Docket No. 6)
(Second Request)

The parties, by the undersigned counsel, at Plaintiff's request, hereby stipulate and agree to extend the briefing schedule and ask the Court to continue the hearing date on Defendants' Motion to Transfer Venue (Docket No. 6) as follows:

Plaintiff's Opposition to Defendants' Motion shall now be due on or before Thursday, October 1, 2015;

Defendants' Reply in support of their Motion shall be due on October 15, 2015, fourteen (14) days after the service of Plaintiff's filed Opposition.

Defendants' Motion has been set for hearing on Thursday, October 16, 2015 at 9:30 a.m. (Docket No. 9). The parties hereby request that the Court reset the hearing on Defendants' Motion for the first available date for hearing after the Motion is fully briefed. The parties believe that the matter of Defendants' Motion to Transfer Venue will be fully briefed and ready for hearing not earlier than Monday, October 26, 2015.

This requested extension of the briefing schedule is made to accommodate Plaintiff's

counsel Joseph Mott, who will be the primary drafter of Plaintiff's brief, and is undergoing a medical procedure the week of September 21, 2015 and will be out of the office until the following week¹. This stipulation is made in good faith and is not merely for delay.

Dated: Thursday, October 1, 2015.

LAW OFFICES OF STEVEN J. PARSONS

JACKSON LEWIS P.C.

/s/ Steven J. Parsons
STEVEN J. PARSONS
Nevada Bar No. 363

/s/ Elayna J. Youchah
ELAYNA J. YOUCHAH
Nevada Bar No. 5837

Attorneys for Plaintiff
ELAINE WITHROW

Attorney for Defendants
CAMDEN DEVELOPMENT, INC.;
CAMDEN PROPERTY TRUST;
H. MALCOLM STEWART, in his capacity as
trustee or fiduciary of the CAMDEN "KEYSOP"


ORDER

IT IS HEREBY ORDERED that Plaintiff's Opposition to Defendants' Motion to Transfer Venue shall be due on or before Thursday, October 1, 2015.

IT IS FURTHER ORDERED that Defendants' Reply in Support of their Motion to Transfer Venue shall be due on or before October 15, 2015, which is fourteen (14) days after the filing of Plaintiff's Opposition to Defendants' Motion.

IT IS FURTHER ORDERED that the hearing on Defendants' Motion to Transfer Venue is continued from Thursday, October 16, 2015 at 9:30 a.m. to Wednesday, November 4, 2015 at 9:30 a.m.

Dated: October 5, 2015.


GEORGE FOLEY, JR.
United States Magistrate Judge

¹ The parties intended for this stipulation to be filed last week, but in the lead up to and outfall from Mr. Mott's medical procedure, the stipulation was not filed as planned.